

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

PANKAJ KUMAR and IVAN CRADDOCK,	)	
	)	
Plaintiffs,	)	Case No. 4:16-CV-00905-JAR
	)	
v.	)	
	)	
TECH MAHINDRA (AMERICAS), INC.,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR APPROVAL OF  
FLSA COLLECTIVE ACTION SETTLEMENT**

COME NOW Plaintiffs Pankaj Kumar and Ivan Craddock (“Named Plaintiffs”), on behalf of themselves and the Collective Action Members (as defined in the attached memorandum in support of this motion), and Defendant Tech Mahindra (Americas), Inc. (“Defendant”), by and through their respective counsel, and respectfully move this Court to approve their FLSA collective action settlement, which is memorialized in a settlement agreement attached hereto as Exhibit 1, and to recertify, for settlement purposes only, an FLSA collective action including only Named Plaintiffs and the Collective Action Members.

The parties’ Memorandum in Support of this Motion is filed contemporaneously herewith and is incorporated by reference.

WHEREFORE, Named Plaintiffs and Defendant respectfully request that the Court find that the proposed settlement is fair and reasonable, that accordingly the Court approve the proposed settlement, that the Court approve Plaintiffs’ request for attorneys’ fees, costs, and service payments to the Named Plaintiffs, that the Court certify an FLSA collective action comprised of Named Plaintiffs and the Collective Action Members (as defined) for settlement purposes only, and that the Court grant the parties such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: September 27, 2019

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ATTORNEYS FOR NAMED PLAINTIFFS  
AND THE COLLECTIVE ACTION  
MEMBERS

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Motion for Approval of FLSA Collective Action Settlement and all supporting documents were filed electronically on September 27, 2019, pursuant to the service requirements of CM/ECF for the Eastern District of Missouri, which will notify all counsel of record.

I further certify that all supporting documents which were filed under seal in conjunction with the Joint Motion were served via E-mail to the following:

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